

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ADN JEANS GROUP LLC,

*Plaintiff,*

v.

MUNDI TRADE, INC.,

*Defendant.*

No. 23-cv-2862 (ALC)

**DECLARATION OF RONALD ADELMAN IN SUPPORT  
OF APPLICATION FOR CLERK’S CERTIFICATE OF DEFAULT**

RONALD ADELMAN, under penalty of perjury, declares as follows:

1. I am the attorney for Plaintiff ADN Jeans Group LLC (“Plaintiff”) in this action.

I make this declaration, based on personal knowledge of the pertinent facts and circumstances, in support of the application of Plaintiff for a Clerk’s Certificate of Default in this action against Defendant Mundi Trade, Inc. (“Defendant”).

2. I commenced this action on behalf of Plaintiff on April 5, 2023. On April 10, 2023, the process server we retained personally served the New York State Secretary of State (“NYS SOS”): (i) the Summons and Complaint and (ii) a copy of the Individual Rules of Judge Andrew L. Carter, Jr. The file-stamped proof of service (ECF No. 7), is attached as Exhibit A. Such service was valid because Defendant is duly registered with the NYS SOS as a Foreign Business Corporation. A copy of the result of the corporation search I performed is attached as Exhibit B.

3. Based on the date of service, Defendant's deadline to respond to the Complaint was May 1, 2023. Defendant failed to do so and, as of the date of this declaration, no person on behalf of Defendant has answered, moved to dismiss, or otherwise appeared in this action. In addition, I did not receive a request for an extension of that deadline.

4. Defendant is a corporation and *ipso facto* is not in military service, an infant or incompetent.

5. Wherefore, Plaintiff requests that the default of Defendant be noted and a certificate of default issued.

6. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to Plaintiff, and that no part thereof has been paid.

Dated: New York, New York  
May 11, 2023

s/Ronald Adelman